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Attorneys for Defendant  
TRRS MAGNATE LLC  
d/b/a HYDRACUP

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

TROVE BRANDS, LLC d/b/a THE  
BLENDERBOTTLE COMPANY, a Utah  
limited liability company,

Plaintiff,

v.

TRRS MAGNATE LLC d/b/a  
HYDRACUP, a California limited liability  
company,

Defendant.

Case No.: 2:22-cv-02222-TLN-CKD

**SECOND JOINT STIPULATION AND  
ORDER TO EXTEND TIME TO RESPOND  
TO COMPLAINT (L.R. 144(a))**

Current Response Date: January 30, 2023

Proposed New Response Date: February 13, 2023

1 Pursuant to L.R. 144(a), Plaintiff Trove Brands, LLC d/b/a The BlenderBottle Company  
2 and Defendant TRRS Magnate LLC d/b/a HydraCup, by and through their undersigned counsel  
3 of record, hereby stipulate as follows:

4 WHEREAS, on January 4, 2023, Plaintiff filed a Stipulation to Extend Time to Respond  
5 to Initial Complaint by Not More Than 28 Days (“First Stipulation”) pursuant to L.R. 144(a)  
6 (Dkt. 12);

7 WHEREAS, the First Stipulation is the only extension of time in this case to date;

8 WHEREAS, the current deadline for Defendant to move, answer, or otherwise respond to  
9 the Complaint is January 30, 2023;

10 WHEREAS, counsel for Defendant was retained on Friday, January 20, 2023;

11 WHEREAS, Defendant’s counsel requested on the same day an extension of time to  
12 move, answer, or otherwise respond to the Complaint from Plaintiff’s counsel;

13 WHEREAS, the parties have agreed to a fourteen (14) day extension of time for  
14 Defendant to move, answer, or otherwise respond to the Complaint;

15 WHEREAS, good cause exists for an extension to permit Defendant’s newly retained  
16 counsel sufficient time to adequately review the Complaint, multiple design patent and trade dress  
17 registrations, other documents related to those intellectual property registrations, numerous  
18 products accused of infringement, other various documents and materials, and thereafter to move,  
19 answer, or otherwise respond to the Complaint;

20 WHEREAS, good cause also exists to allow the parties time to engage in discussions  
21 regarding whether an early settlement is possible before Defendant responds to the Complaint;

22 WHEREAS, the requested extension will not alter the date of any event or deadline  
23 already fixed by the Court;

24 **IT IS HEREBY STIPULATED AND AGREED** by the parties as follows:

25 The deadline for Defendant to move, answer, or otherwise respond to the Complaint shall  
26 be extended up to and including February 13, 2023.

27  
28

**NOW, THEREFORE**, the parties hereby respectfully request that the Court approve this Second Joint Stipulation to Extend Time to Respond to Complaint and extend the deadline for Defendant to move, answer, or otherwise respond to the Complaint up to and including February 13, 2023.

Respectfully submitted,

Dated: January 24, 2023

HOLLAND LAW LLP

By: /s/ Clark A. Waldon

CLARK A. WALDON  
CHRISTOPHER T. HOLLAND  
Attorneys for Defendant  
TRRS MAGNATE LLC d/b/a HYDRACUP

Dated: January 24, 2023

KNOBBE, MARTENS, OLSON & BEAR, LLP


By: /s/ Jacob R. Rosenbaum

Ali S. Razai  
Paul A. Stewart  
Jacob R. Rosenbaum

*Attorneys for Plaintiff,*  
Trove Brands, LLC  
d/b/a The Blenderbottle Company

In accordance with the foregoing stipulation, **IT IS SO ORDERED.**

Dated: January 24, 2023

  
Troy L. Nunley

Troy L. Nunley  
United States District Judge